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Attorneys for Plaintiff Fremont Emergency Services (Scherr), Ltd.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FREMONT EMERGENCY SERVICES
(SCHERR), LTD.;

Plaintiff,

vs.

UNITEDHEALTHCARE INSURANCE
COMPANY and UNITED
HEALTHCARE SERVICES, INC.,

Defendants.

Case No. 2:22-cv-01118-CDS-BNW

*Stipulation and [Proposed] Order to
Extend Deadlines for Plaintiff's Response
and Defendants' Reply to Defendants'
Motion to Stay*

Plaintiff, Fremont Emergency Services (Scherr), Ltd. (hereafter, "Plaintiff"), by and through its attorneys of record, and Defendants, UnitedHealthcare Insurance Company and United Healthcare Services, Inc. (hereafter, "Defendants"), by and through their attorneys of record, hereby stipulate and agree to the following:

1. Plaintiff stipulated to allow Defendants to respond to the Complaint [DOC 1] on or before September 8, 2022.
2. Defendants filed their Motion to Dismiss [DOC 29] on September 8, 2022.

- 1 3. The Response to Defendants' Motion is currently due on or before October 17, 2022, per
- 2 the stipulation of the parties.
- 3 4. Thereafter, Defendants filed their Motion to Stay Discovery [DOC 40] on September 29,
- 4 2022.
- 5 5. Plaintiff's Response to the Motion to Stay Discovery is due on or before October 13,
- 6 2022. Defendants' Reply to the Motion to Stay Discovery would be due on or before
- 7 October 20, 2022.
- 8 6. Given the overlap of the briefing schedule for the Motion to Stay Discovery and the
- 9 Motion to Dismiss, the parties have stipulated to extend the briefing schedule on the
- 10 Motion to Stay, making **Plaintiff's Response due on or before October 21, 2022, and**
- 11 **Defendants' Reply due on or before November 4, 2022.**
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7. The Motion to Stay is currently set for hearing in front of Magistrate Weksler on November 14, 2022.

Respectfully submitted,

DATED this 10th day of October, 2022.

By: /s/ Renee M. Finch
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DATED this 10th day of October, 2022.

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE

DATED: October 11, 2022